



Mr. Courtnage:

Axiall/Westlake's use of asbestos is limited to production of diaphragms for use in our chlor-alkali facility in Plaquemine, LA. Our uses are consistent with the ACC comments filed recently with EPA. Currently, we have a several year supply on hand and do not plan any further imports. We expect to eventually switch to a non-asbestos technology.

The questions that were asked by EPA, and answers are listed below:

1. Do we have worker monitoring information for asbestos?
 - See Attachment 1 (Asbestos Personal Sampling Results – Cell Renewal)
 - See Attachment 2 (Asbestos Personal Sampling Results – Chlorine Cell Line)
2. Estimate of releases of asbestos to air, water, and land.
 - Air – 3.6 pounds calculated in 2016. Based on amount of asbestos used, number of cell renewals performed and 98.8% scrubber efficiency.
 - Water – None
 - Land – None
3. Do we have documentation of asbestos content in Sodium Hydroxide product?
 - The diaphragm is a modified combination of asbestos and a polymer baked together into a non-friable material. This binder material prevents fibers from being released from the diaphragm during operation. Additionally, all products pass through filter banks designed to remove particulates, including salt and any potential asbestos.
 - The Plaquemine facility has performed quantitative analysis for asbestos in product caustic. All samples analyzed to date have been determined to contain zero fibers.
4. Asbestos waste streams – where does asbestos waste go?
 - Waste is washed from the cells within the Cell Renewal Building. It is contained and travels through designated drain system to a filter press. The filter pressed material goes to a designated, secure, covered roll off box. Once full, the box is transported with Asbestos Disposal Verification Form to an approved landfill as a non-hazardous waste. The landfill designates a single "cell" for asbestos disposal.
5. Any variances known in our handling processes from other manufacturers?
 - None known
6. Plans to exit asbestos technology, if any?
 - We expect to eventually switch to a non-asbestos technology. Timing is unknown.
7. Confirm the amount of asbestos reported in the 2016 CDR report.
 - Our Product Stewardship Group confirmed that for 2015 the import quantity was 152,000 lbs.
8. How are diaphragms made?
 - See Attachment 3 (Cell Renewal Offline Circuit)